

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**


|  |   |                                     |
|--|---|-------------------------------------|
| -----  | X |                                     |
| BRIAN FLORES, STEVE WILKS and RAY              | : |                                     |
| HORTON, as Class Representatives, on behalf of | : |                                     |
| themselves and all others similarly situated,  | : |                                     |
|  | : |                                     |
| Plaintiffs,                                    | : |                                     |
|  | : |                                     |
| v.   | : |                                     |
|  | : |                                     |
| THE NATIONAL FOOTBALL LEAGUE; NEW              | : | Civil Action No.: 22-cv-00871 (VEC) |
| YORK FOOTBALL GIANTS, INC. d/b/a NEW           | : |                                     |
| YORK GIANTS; MIAMI DOLPHINS, LTD.              | : |                                     |
| d/b/a MIAMI DOLPHINS; DENVER BRONCOS           | : |                                     |
| FOOTBALL CLUB d/b/a DENVER BRONCOS;            | : |                                     |
| HOUSTON NFL HOLDINGS, L.P. d/b/a               | : |                                     |
| HOUSTON TEXANS; ARIZONA CARDINALS              | : |                                     |
| FOOTBALL CLUB LLC d/b/a ARIZONA                | : |                                     |
| CARDINALS; TENNESSEE TITANS                    | : |                                     |
| ENTERTAINMENT, INC. d/b/a TENNESSEE            | : |                                     |
| TITANS and JOHN DOE TEAMS 1 through 26,        | : |                                     |
|  | : |                                     |
| Defendants.                                    | : |                                     |
| -----  | X |                                     |

**PLEASE TAKE NOTICE** that upon the accompanying memorandum of law and other supporting documents, Plaintiffs Brian Flores, Steve Wilks and Ray Horton will move this court, at the United States District Court, Southern District of New York, located at 40 Foley Square, New York, NY 10007 before the Honorable Valerie Caproni, to respectfully request an order pursuant to 28 U.S.C. §1292(b), certifying for appeal the aspects of the Court’s orders dated March 1, 2023 and July 25, 2023 (Dkt. Nos. 76 and 102, respectively) that granted Defendants’ motion to compel arbitration.

Dated: September 5, 2023  
New York, New York

Respectfully submitted,

**WIGDOR LLP**

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- and -

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